PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Sub-Section 4.1.4.1: Packing instruction P650, Paragraph 9 (a)

Transmitted by the expert from Austria

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2006/3 where clarification was requested on the applicable requirements to be met for dry ice or liquid nitrogen as cooling media for UN 3373.

2. The Joint Meeting at its spring session of 2006 did, in principle, not question this request and it was stated in the report (ECE/TRANS/WP.15/AC.1/102, para 30) that it would be necessary to list these requirements at least in the case of liquid nitrogen. The question should be asked to the UN Sub-Committee of Experts on the Transport of Dangerous Goods. If the Sub-Committee was unable to solve the problem, the Joint Meeting could deal with it in an explanatory note.

3. The representative of Austria then submitted a relevant proposal to the Sub-Committee (ST/SG/AC.10/C.3/2006/16) where he described the uncertainties with the current text and suggested changes to Packing Instruction P650, paragraph 9 (a) and to Special Provision 319.

4. The Sub-Committee dealt with the proposal at its 29th session in July 2006 but did not solve the problem. In the report (ST/SG/AC.10/C.3/58 para 66 and 67) it was stated that according to several experts there was no need to amend paragraph 9 (a) of packing instruction P650 because the requirements applicable to the use of dry ice or liquid nitrogen for the purpose of keeping samples of infectious substances cold varied according to the type of transport or relevant legal instrument.

5. The expert from Austria then said that he would try accordingly to resolve the interpretation of the paragraph for land transport at the RID/ADR/ADN Joint Meeting.

6. **Proposal**

At the end of Subsection 4.1.4.1: Packing instruction P650, paragraph 9 (a) insert the following NOTE:

“**NOTE**: The applicable requirements to be met for the media used to keep the substances cold are Chapter 3.3 Special Provision 297 for the dry ice and the packing requirements approved by the competent authority for the liquid nitrogen.”